

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK DIVISION

THE INDEPENDENCE PROJECT, INC.,
a New Jersey Non Profit Corporation, and
RONALD MOORE, Individually,

Plaintiffs,

v.

Case No. 2:17-cv-06221-ES-JAD

H.G. CLARKE, a New Jersey Limited
Liability Company,

Defendant.

NOTICE OF SETTLEMENT

COMES NOW the Plaintiffs, The Independence Project, Inc., a New Jersey Non-Profit Corporation, and Ronald Moore, Individually, by and through their undersigned counsel, and informs the Court that the matter has been amicably settled between the Parties, subject to the final execution of the settlement documents, and hereby requests:

1. The Plaintiffs request that pursuant to a Court Order, that the case be dismissed subject to the right of any party to move the Court within sixty (60) days for the purpose of entering a Joint Stipulation for Dismissal With Prejudice with the Court Retaining Jurisdiction to Enforce the Terms of the Settlement Agreement and to determine the amount of attorney's fees, litigation expenses and costs to be awarded Plaintiffs, or, on good cause shown, to re-open the case for further proceedings.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **5th** day of **April, 2018**, a true and correct copy of the foregoing was electronically filed via the Court's CM/ECF System which will send a Notice of Electronic Filing to counsel for the Defendant, Frederick Benno Polak, Esq., fpolak@postpolak.com, Post, Polak, Goodsell, Macneill & Strauchler, P.A., 425 Eagle Rock Ave, Ste 200, Roseland, NJ 07068.

Respectfully Submitted,

/s/Alan R. Ackerman

Alan R. Ackerman, Esq. (AA9730)

Law Offices of Alan R. Ackerman

1719 Route 10 East, Suite 106

Parsippany, NJ 07054-4519

Telephone: (973) 898-1177 x 122

Facsimile: (973) 898-1230

araesq@alanackermanlaw.com

and

John P. Fuller, Esq., *pro hac vice*

Fuller, Fuller & Associates, P.A.

12000 Biscayne Boulevard, Suite 502

North Miami, FL 33181

Telephone: (305) 891-5199

Facsimile: (305) 893-9505

jpf@fullerfuller.com

Attorneys for Plaintiffs